



ERICO International Corporation
Corporate Headquarters
31700 Solon Road
Solon, Ohio 44139
U.S.A.

Phone: 440-349-2630
Fax: 440-349-2996
Direct Fax: 440-848-8387
www.erico.com

February 2, 2012

Ms. Michelle Kerr
Remedial Project Manager
U.S. Environmental Protection Agency – Region 5
Superfund Division
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: General Notice for the Chemetco Superfund Site in Hartford, Illinois

Dear Ms. Kerr:

After receipt and review of the site file DVD and following discussions with United States Environmental Protection Agency (“EPA”) attorney Thomas Martin, ERICO International Corporation hereby responds to the General Notice Letter dated November 30, 2011 addressed to Erico Products, Inc regarding the Chemetco Superfund Site (“Site”). ERICO Products, Inc. was merged into ERICO in 2006. ERICO hereby denies any liability with respect to the Site, including, without limitation, on the basis that (i) ERICO did not arrange for the disposal of hazardous substances at the Site, but rather sold useful product consisting of commercial grade copper clad to Chemetco, (ii) ERICO’s shipments to Chemetco were, in whole or in part, covered by the protections afforded to recyclers under CERCLA Section 127, 42 U.S.C. § 9627, and (iii) ERICO’s commercial grade copper clad is very unlikely to have contributed to any contamination at the Site.

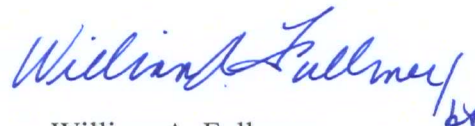
ERICO sold commercial grade copper clad to Chemetco, Inc. in Charlotte, NC during a short period of time in the past for which Chemetco paid fair market value for this valuable commodity. Any involvement on the part of ERICO with Chemetco was limited to “arranging for the recycling” of “recyclable materials” in accordance with CERCLA § 127. The waste-in sheet provided with EPA’s General Notice Letter represents that Erico sent only recyclable copper clad to the Site, and did not send any material that was excluded from the definition of scrap metal.

Furthermore, EPA’s own waste-in list represents that the total weight of lead materials, combustibles, computer parts, and miscellaneous materials sent by ERICO to Chemetco was zero. Accordingly, ERICO believes that its shipments of commercial grade copper clad to Chemetco were in a condition to be used immediately as a feedstock in Chemetco’s recycling of steel and copper, thereby avoiding the contamination concerns associated with such lead materials, combustibles, computer parts and miscellaneous materials as reflected on EPA’s waste-in list. Therefore, ERICO believes it was incorrectly included as a recipient of the General Notice Letter and has no liability at the Site.

Ms. Michelle Kerr
Remedial Project Manager
U.S. Environmental Protection Agency – Region 5
February 2, 2012
Page Two

ERICO understands that EPA is still gathering information with respect to PRPs at the Site and potential allocation of liability. However, given the facts set forth above and as supported by ERICO's May 27, 2008 response to Illinois EPA's Request for Information, ERICO should not be included with any group of PRPs asked to take a leading role in negotiating or performing any investigation or other response action at the Site. Nonetheless, ERICO will consider any further information and communications from EPA with respect to the Site, including any de minimis settlement offer commensurate with the type and quantity of materials Chemetco received from ERICO if any CERCLA liability is established.

Sincerely,



William A. Fullmer
General Counsel

WAF:bt